

March 18, 2013

Joseph H. Graziano, PhD,
Chair, Ad hoc Committee Reviewing EPA IRIS Arsenic Assessment
Professor of Environmental Health Sciences and Professor of Pharmacology
Columbia University - Mailman School of Public Health
722 West 168th Street
New York, NY 10032

Re: NAS Review of EPA's IRIS Toxicological Assessment of Inorganic Arsenic

Dear Dr. Graziano;

We are writing to express concern regarding the scientific integrity of the April 4th NAS workshop on arsenic. This relates to both panel balance and conflicts of interest.

The workshop has five panelists who are substantially supported by industry and have represented the interests of the industries that support them. These include scientists from Exponent, Gradient, Hamner, a pharmaceutical company employee and Samuel Cohen. They are presenting on numerous topics. The panel does not include any scientists from organizations dedicated to public health or environmental health. The imbalance is clear and results in the NAS committee hearing from only a segment of the scientific community (industry and government), depriving it of the full “variety of perspectives”, as specified in your committee’s scope of work.

The scientific integrity of this committee’s work is seriously undermined by the inclusion of numerous workshop panelists with financial conflicts of interest. While all credible scientific viewpoints should be heard, the separation must be clear between scientists with financial interests and those that are unconflicted. Objective science should not be undermined by the lack of identification of panelists who are industry-funded or by weighting the panel towards science that is funded by those with financial interests.

We work in the medical-scientific areas involving arsenic and have dealt with the health damage from arsenic for many years in the communities and patients that we serve. We believe that organizations that work on behalf of the public good in the arena of public health and the environment may not be able to rely upon or support conclusions reached by this panel in the absence of substantial changes in the approach being currently taken by the ad hoc committee.

To address the problems we have identified above, we ask that you:

- 1) require full public disclosure of financial ties of all presenters at the April 4th meeting,
- 2) insure balance in the affiliations and funding of presenters at the April 4th meeting and
- 3) in future workshops and similar meetings, insure technical presentations are structured so that the scientific deliberations fully explore the range of legitimate scientific discourse on all topics that are critical to the toxicological assessment and any risk estimates made for inorganic arsenic and clearly delineate presentations made by those with financial conflicts of interest.

We are confident that the National Academy of Sciences can provide objective reviews of science, if financial conflicts of interest are eliminated and the full spectrum of scientific evidence is explored on critical topics. We hope that it is possible to obtain this type of objective review for inorganic arsenic.

Respectfully submitted by:

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cc: Susan Martel, NAS;
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Barbara Warren, Citizens Environmental Coalition
Richard Moore and Michele Roberts, Environmental Justice Health Alliance for
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